

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of:)	
)	
Review of the Section 251 Unbundling)	
Obligations of Incumbent Local Exchange)	CC Docket No. 01-338
Carriers)	
)	
Implementation of the Local Competition)	
Provisions of the Telecommunications Act of)	CC Docket No. 96-98
1996)	
)	
Deployment of Wireline Services Offering)	CC Docket No. 98-147
Advanced Telecommunications Capability)	

AFFIDAVIT OF STEVEN K. WACHTER

1. I, Steven K. Wachter, certify that the following is my true testimony. I am the Executive Vice President of Sales for Eschelon Telecom, Inc. ("Eschelon").
2. In addition to my current position, I have also previously served as Ameritech Corporation's Director Business Sales-Wisconsin, East Region GM/Director-Small Business Marketplace, General Manager/Director-Premises Sales and Director of Sales Programming.
3. Eschelon employs more than 270 telecommunications and business telephone system sales and consulting professionals and currently provides services in Arizona, Colorado, Minnesota, Nevada, Oregon, Utah, and Washington. Eschelon seeks to serve small and medium sized businesses. Eschelon's emphasis on small business is evidenced by the fact our average number of access lines per customers is under five. Eschelon's sales and consulting professionals provide

expert advice to our small business customers to assist them in selecting the most cost-effective telecommunications equipment and network services. Most of Eschelon's customers are too small to have a telecommunications specialist on staff and they value the expert assistance we provide.

4. Areas served by Eschelon's collocations are called "on-net." Areas outside of Eschelon's collocations are called "off-net."
5. Eschelon serves a geographically dispersed market segment. Over twenty-five percent of Eschelon's customers take service at multiple physical locations, one or more of which is in Eschelon's "off-net" territory. In many cases, these customers would not even consider Eschelon as a service provider if Eschelon were not able to serve all their locations, both "on-net" and "off-net."
6. Access to UNE combinations gives Eschelon a means of serving "off-net" customer locations and that ability increases Eschelon's ability to attract "on-net" customers. Without a means for serving "off-net" customer locations, Eschelon would attract fewer customers "on-net" and would correspondingly reduce its investment in "on-net" facilities.
7. Eschelon's sales productivity would be hurt significantly if sales representatives did not have an "off-net" product to sell. Since Eschelon's sales force is compensated through commissions, Eschelon would certainly lose some of its best sales representatives if sales were limited to "on-net" areas because sales would necessarily fall.

8. Eschelon's ability to sell "off-net" using the UNE combination product is a very important factor in Eschelon's sales success.

FURTHER AFFIANT SAYETH NOT.

Dated this 4th day of April, 2002.

/s/ Steven K. Wachter
Steven K. Wachter

Subscribed and sworn to before me
this 4th day of April, 2002.

/s/ Tobe L. Goldberg
Notary Public
My Commission Expires: January 31, 2005